

Ryland, Renea

From: Ryland, Renea
Sent: Wednesday, May 24, 2017 9:36 AM
To: Harrison, Ben; Morgan, Jeanette
Subject: WAR ITEM
Attachments: WAR_GPCrossett_Interim Objection.docx

Attached is a WAR item for the GP Crossett Interim Objection. Ben - please take a look and see if you think it looks OK. Thanks. Renea

Non-Confidential

Region 6 Requests Additional Information Concerning ADEQ's Preliminary Draft NPDES Permit for Georgia-Pacific's Crossett Facility

On May 19, 2017, EPA Region 6 issued an Interim Objection to the Arkansas Department of Environmental Quality (ADEQ) under 40 CFR 123.44(d)(2) stating that additional information and clarification regarding the treatment plant and its effluent discharge locations are needed to determine whether ADEQ's draft National Pollutant Discharge Elimination System (NPDES) permit for the Georgia-Pacific, LLC. Crossett Paper Operations (GP Crossett) facility meets the guidelines and requirements of the Clean Water Act.

ADEQ submitted the draft permit to EPA for review on March 6, 2017. Under the draft permit, GP Crossett is authorized to discharge treated waste water effluent to the upper reaches of Mossy Lake, then to Coffee Creek, then to the Ouachita River. Based on its review, Region 6 has questions concerning the application of technology-based and water quality-based effluent limits in regard to Mossy Lake and whether ADEQ believes Mossy Lake to be part of the facility's waste treatment system. Region 6 also requested information to clarify where the facility's waste treatment system lies in relation to Coffee Creek upstream of Mossy Lake, and documentation to evidence that the facility's effluent stream and Coffee Creek do not co-mingle, even in flood conditions.

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